

Hearing Date and Time: May 1, 2020, at 2:00 p.m. (E.T.)
Filing Deadlines of April 26, 2020 and April 29, 2020 as detailed below.

PILLSBURY WINTHROP SHAW PITTMAN LLP
Andrew M. Troop
31 West 52nd Street
New York, New York 10019
212-858-1000

Counsel to the Ad Hoc Group of Non-Consenting States

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|-------------------------|
| In re: |) | Chapter 11 |
| |) | |
| PURDUE PHARMA L.P., <i>et al.</i> , ¹ |) | Case No. 19-23649 (RDD) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |

**NOTICE OF TELEPHONIC HEARING ON (I) MOTION
OF THE AD HOC GROUP OF NON-CONSENTING STATES FOR
AN ORDER AUTHORIZING EXAMINATIONS OF CERTAIN FINANCIAL
INSTITUTIONS PURSUANT TO RULES 2004 AND 9016 OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE AND (II) DISCOVERY DISPUTES
BASED ON SUBPOENAS ISSUED BY THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS PURSUANT TO ORDERS AUTHORIZING
RULE 2004 DISCOVERY FROM THE INITIAL COVERED SACKLER PERSONS**

PLEASE TAKE NOTICE that on April 7, 2020, the Ad Hoc Group of Non-Consenting States (the “**Non-Consenting States**”) filed its *Ex Parte Motion of the Ad Hoc Group of Non-Consenting States for an Order Authorizing Examinations of Certain Financial Institutions Pursuant to Rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure* [Docket No. 1019], which the Official Committee of Unsecured Creditors (the “**UCC**”) joined

¹ The debtors in these chapter 11 cases (“**Debtors**”), along with the last four digits of their federal tax identification numbers, are Purdue Pharma Manufacturing L.P. (3821), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies K.P. (1868), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (6166), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors’ principal offices are at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

[Docket No. 1026] (collectively, the “**NCSG Motion**”).

PLEASE TAKE FURTHER NOTICE that on March 27, 2020 and April 2, 2020, the Bankruptcy Court entered orders authorizing discovery pursuant to Fed. R. Bankr. P. 2004 from the Initial Covered Sackler Persons, as defined therein [Docket Nos. 992 and 1008] (together, the “**Initial Covered Sackler Rule 2004 Orders**”).

PLEASE TAKE FURTHER NOTICE that a hearing on the NCSG Motion and on disputes arising from the subpoena issued by the UCC pursuant to the Initial Covered Sackler Rule 2004 Orders (the “**Subpoena Disputes**”) will be held on **May 1, 2020 at 2:00 p.m. (E.T.)** (the “**Hearing**”) before the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that the relief sought pursuant to the NCSG Motion has been modified from the proposed order submitted with the NCSG Motion to the relief set forth in a new proposed order attached as **Exhibit A**. A redline showing the changes in the form of proposed order from the version submitted with the NCSG Motion is attached as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that pursuant to General Order M-543, dated March 20, 2020 (Morris, C.J.) (“**General Order M-543**”), the Hearing will be conducted telephonically. Parties wishing to appear at, or attend, the Hearing must refer to and comply with the Bankruptcy Court’s guidelines for telephonic appearances² and make arrangements with Court Solutions LLC by telephone at (917) 746-7476.

PLEASE TAKE FURTHER NOTICE that any responses or objections (“**NCSG Motion Objections**”) to the NCSG Motion shall be in writing, conform to the Federal Rules of Bankruptcy

² The Bankruptcy Court’s procedures for telephonic appearances are available at:
<http://www.nysb.uscourts.gov/telephonic-appearances-white-plains>.

Procedure and the Local Bankruptcy Rules for the Southern District of New York, filed with the Bankruptcy Court, and served in accordance with the *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures* entered on November 18, 2019 [Docket No. 498], so as to be filed and received no later than **April 26, 2020**. Replies to any timely-filed NCSG Motion Objection shall be filed and received no later than **April 29, 2020**.

PLEASE TAKE FURTHER NOTICE that the UCC will file its position with regard to the Subpoena Disputes (the “**UCC Dispute Statement**”) so as to be filed and received no later than **April 26, 2020**. Objections or responses to the UCC Dispute Statement (“**UCC Dispute Statement Objections**”) shall be filed and received no later than **April 29, 2020**.³

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the Hearing **telephonically** so long as General Order M-543 is in effect or unless otherwise ordered by the Bankruptcy Court. Failure to appear may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that if no NCSG Motion Objections are filed and served by **April 26, 2020**, the Non-Consenting States may submit the order attached as Exhibit A to the Bankruptcy Court, which order the Bankruptcy Court may enter without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that if no UCC Dispute Statement Objections are filed and served by **April 29, 2020**, the UCC may submit an order to the Bankruptcy Court resolving the UCC Dispute Statement, which order the Bankruptcy Court may enter without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that copies of the Motion, and of the UCC Dispute

³ The pre-hearing filing deadlines set forth in this Notice reflect the agreement of the Non-Consenting States, the UCC, the Debtors, the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants, members of the Raymond Sackler Family represented by Milbank LLP, and members of the Mortimer Sackler Family represented by Debevoise & Plimpton LLP.

Statement and all Objections once filed, may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://restructuring.primeclerk.com/purduepharma>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: April 24, 2020
New York, New York

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ Andrew M. Troop
Andrew M. Troop
31 West 52nd Street
New York, NY 10019
Telephone: (212) 858-1000
Email: andrew.troop@pillsburylaw.com

Counsel to the Ad Hoc Group of Non-Consenting States